

# EXHIBIT E

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

E. JEAN CARROLL, )  
Plaintiff, )  
-against- ) 20-cv-7311(LAK)  
DONALD J. TRUMP, in his )  
personal capacity, )  
Defendant. )  
\_\_\_\_\_ )

\*\*\*CONFIDENTIAL\*\*\*

VIDEOTAPED DEPOSITION OF  
E. JEAN CARROLL  
New York, New York  
Friday, October 14, 2022

Reported By:  
CATHI IRISH, RPR, CRR, CLVS

1 CARROLL - CONFIDENTIAL

2 defendant's statements?

3 A. Absolutely.

4 Q. Why do you think that?

5 A. I believe they thought that the  
6 column had taken a hit. Here it was  
7 probably the number one feature for years  
8 and I'm a liar.

9 Q. Did someone from Elle tell you  
10 that?

11 A. No, they would never admit it.

12 Q. Who advised you that you were  
13 being terminated from Elle Magazine?

14 A. The managing editor.

15 Q. Who was that?

16 A. I had to look her up when she  
17 called, Erin Hobday. I thought she was  
18 calling me to invite me to the Christmas  
19 party.

20 Q. Were you surprised by your  
21 termination?

22 A. That's putting it mildly.

23 Q. In what manner were you advised?

24 A. Very cheerful conversation. She  
25 said I'm calling to inform you that we

1 CARROLL - CONFIDENTIAL

2 are not relevant but DF99WWW24RY-

3 dms-ngarcia@hearst.com.

4 A. Yes.

5 Q. The date is 8/4/2019?

6 A. Yes.

7 Q. Okay. Do you know who ngarcia at  
8 Hearst would be?

9 A. Who?

10 Q. I'll state it differently.

11 A. Oh, Nina Garcia.

12 Q. Exactly. Who is Ms. Garcia?

13 A. Ms. Garcia is a well respected  
14 editor in the magazine world. She is the  
15 editor-in-chief of Elle. She's also one  
16 of the stars of Project Runway.

17 Q. She was the editor-in-chief at  
18 Elle at this time?

19 A. Yes.

20 Q. Did you have a relationship with  
21 Ms. Garcia?

22 A. No, just an admirer of hers. I  
23 liked her style, I liked her on Project  
24 Runway.

25 Q. According to the contents of this

1 CARROLL - CONFIDENTIAL

2 communication, it states "Hi, Kate, Emma  
3 told me you are aware of the E. Jean  
4 situation. Sadly she will not reconsider  
5 her exclusive with New York Magazine.  
6 I've been talking to Erin Hobday about our  
7 situation with HR, and Brandy about our PR  
8 strategy. Both feel prepared to move  
9 forward. I don't feel it sets the right  
10 precedent if we keep her. Let me know  
11 your thoughts."

12 A. Exactly.

13 Q. Do you know who Erin --

14 MS. KAPLAN: I think she was  
15 going to say exactly. Anything else?

16 THE WITNESS: This is a shocking  
17 e-mail for me because what precedent  
18 are they talking about, does anybody  
19 know?

20 BY MS. HABBA:

21 Q. I'll ask you some more detailed  
22 questions.

23 According to the contents of this  
24 communication that I just read, it is said  
25 that you would not reconsider your

1 CARROLL - CONFIDENTIAL

2 your blog?

3 A. Oh, Substack, yes, I do.

4 Q. You do. Do you know how much?

5 A. Yes, 70,000 a year.

6 Q. And how long have you been  
7 generating that amount of income from the  
8 blog?

9 A. It was immediately popular. Not  
10 a big huge massive salutation but it's  
11 doing all right. I enjoy writing it.

12 Q. Did it increase after 2019?

13 A. Oh, I didn't start it until 2021.

14 Q. So it's pretty successful since  
15 you started it?

16 A. It's successful for a Substack,  
17 yes.

18 Q. Have you sued anyone else?

19 A. No.

20 Q. Have you ever been sued?

21 A. No.

22 Q. Last set of questions I have for  
23 you, you stated in the public that you had  
24 DNA from the former president; is that  
25 correct?

1 CARROLL - CONFIDENTIAL

2 A. Yes.

3 Q. Why did you state that?

4 A. Because we sent the dress to be  
5 examined and then we got back a report.  
6 Robbie published it.

7 Q. What did that report say that you  
8 recall? And don't divulge anything that's  
9 privileged, please, so conversations  
10 between you and your attorney I don't want  
11 to know.

12 A. It is so far above my head. The  
13 reports about DNA are so detailed and so  
14 much scientific rigor is required to  
15 understand even the opening paragraph, I  
16 can't really -- I can't say.

17 Q. And how did you discover that  
18 there might have been a trace of DNA from  
19 this event?

20 MS. KAPLAN: I don't think you  
21 can answer that question.

22 MS. HABBA: Okay. I think I'm  
23 done.

24 Oh, yes, I forgot.

25 ///